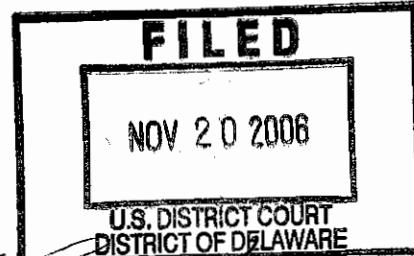


IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARECharles P. Jones  
Plaintiffv.  
Thomas Carroll, et. al.,  
Defendants

Civil Action No.

06-129-KAJ

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Motion for Appointment of Counsel

Pursuant to 28 U.S.C. 1915(d) Plaintiff moves for an order appointing counsel to represent him in this case. In support of this motion Plaintiff states the following:

1. Plaintiff is unable to afford counsel.
2. Plaintiff is now housed at New Haven Facility, C-VOP, P.O. Box 5003, Smyrna, De. 19977, And there is no law library and no paralegal service which puts Plaintiff at a great disadvantage in litigating this case.
3. A trial in this case will likely involve conflicting testimony and counsel would better enable Plaintiff to present evidence and cross examine witnesses.

4. Expert Testimony will be needed and not possible by Plaintiff to obtain miss Counsel.
5. There will be need to access Records and Conduct investigations not possible by Plaintiff.
6. Counsel is needed in order to properly prepare motions to Amend Complaint.
7. There is Credibility (whether or not a witness is telling the truth) which is most important and Counsel will be needed to cross-examine.

When looking at the factors delineated in Tabron to determine whether appointment of Counsel is appropriate Plaintiff Clearly fit several of these factors. Wherefore, Plaintiff prays and respectfully request that Your Honor Please Appoint Counsel in this case.

December 3, 2006

( )  
DATE

Especially Submitted  
Charles P. Jones

Charles P. Jones

#228197

C-YOP, P.O. Box 5003

Smyrna, DE 19977

*Certificate of Service*

I, Charles P. Jones, hereby certify that I have served a true and correct copy(ies) of the attached: motion for Appointment of Counsel upon the following parties/person(s):

TO: Clerk  
Delaware District Court  
Box 18  
844 King Street  
Wilmington, De. 19801

TO: Ophelia M. Waters  
(Deputy Attorney General)  
820 North French Street  
6th Floor  
Wilmington, De. 19801

By placing same in a sealed envelope, and  
depositing same in the United States Mail at  
the C-VOP, P.O. Box 5003, Smyrna, De. 19977.

On this 3rd, day of November, 2006

*Charles S. Jones*  
IM 2228192 UNIT 826  
SBI# 2228192 CENTRAL VIOLATION CENTER  
P.O. BOX 5003  
SMYRNA, DELAWARE 19977-5003

SBI#222877 UNIT 8  
CENTRAL VIOLATION CENTER

SBI# 228523 UNIT 2

PO BOX 5003

SMYRNA, DELAWARE 19977-5003

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